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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

JUN 19 1997

Federal Communications Commission
Office of Secretary

In the Matter of)
)
Administration of the North)
American Numbering Plan)
Carrier Identification Codes (CICs))

CC Docket No. 92-237

TO: The Commission

COMMENTS IN SUPPORT OF COMPTEL'S PETITION FOR RECONSIDERATION

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June 19, 1997

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Cable & Wireless, Inc. ("CWI") respectfully submits its Comments in Support of the Petition for Reconsideration filed by The Competitive Telecommunications Association ("CompTel") in the above-captioned proceeding.¹ CWI is an interstate and international interexchange carrier serving customers throughout the United States. CWI has begun offering local telecommunications services in several locations.

CWI supports CompTel's request that the Commission reconsider its decision to accelerate the transition of the conversion from three digit Feature Group D carrier identification codes ("CICs") to four digit Feature Group D CICs so that it is completed by January 1, 1998. CWI agrees with CompTel that a January 1, 1998 deadline does not give interexchange carriers a reasonable period of time in which to educate consumers about the new dialing patterns or to complete the reprogramming or upgrading of equipment to accommodate the conversion. For example, in certain states, such as California, intraLATA presubscription has not yet been ordered. These states have allowed intraLATA competition, but only on a 10XXX basis. In

¹ Second Report and Order, CC Docket No. 92-237, 1997 Westlaw 174495, FCC 97-125, Released April 11, 1997 (hereinafter the "Order").

California (and other such states), CWI relies extensively on the use of automatic dialers to provide its subscribers with the convenience of 1+ dialing for intraLATA toll calls.² The automatic dialer eliminates the need for the customer to dial 10XXX to place an intraLATA call with CWI rather than the incumbent LEC. Therefore, while it is more inconvenient and expensive than intraLATA presubscription, the use of dialers mutes some of the competitive advantages enjoyed by PacTel in the California intraLATA market and provides consumers with the benefits of competition in the intraLATA market.

However, whenever the access code conversion takes place, CWI will be forced to send technicians to the offices of each and every customer with a CWI provided dialer in order to reprogram the dialers to the new access code. Since April, the dialers installed by CWI have already been programmed to accept four digit CICs. However, existing dialers in the field have not yet been converted. To complete this transition in less than nine months will be technically and economically burdensome.³ Nine months is insufficient time to notify all affected customers of the change, schedule appointments with those customers, and make the necessary conversions. There is, therefore, a very real threat that customers whose dialers cannot be reprogrammed by

² As discussed in footnote 5 of CompTel's Petition, a dialer is a device installed at the Customer's location that is programmed to automatically dial the CIC when the customer dials a 1+ intraLATA call.

³ Cable & Wireless was of the belief that it had six years to complete the conversions. *See Administration of the North American Numbering Plan*, Notice of Proposed Rulemaking, CC Docket No. 92-237, 9 FCC Rcd 2068 (1994) ("NPRM"). In addition, the Commission had not yet adopted any final rules mandating a conversion from three to four digit CICs until April of this year. Therefore, it was reasonable for Cable & Wireless to limit the number of dialers converted, as well as the amount of resources it expended on the transition, until the Commission adopted formal rules in this docket.

January 1, 1998, will suddenly find themselves without intraLATA long distance service. The result will be widespread customer confusion and agitation.

Furthermore, CWI will incur substantial expense in converting its dialers in the timeframe set by the Commission in its Order. Release of the Commission's decision to move the conversion schedule was unexpected and comes without any real advance notice to the carriers. The required expenditure of this unexpected and unbudgeted amount will be burdensome to CWI. This is particularly troublesome at a time when CWI is attempting to devote substantial resources to entering newly competitive local markets.

Finally, because CWI must expend the resources (financial and otherwise) to make the conversions for intraLATA customers with automatic dialers, and to identify and notify customers that use a PBX of the need to reprogram their equipment, it is placed at a competitive disadvantage to PacTel. PacTel, being the only presubscribed carrier for intraLATA calls, need not worry about making such conversions, about expending any resources to do so, or about notifying customers of the need to reprogram equipment. Likewise, it does not face the possibility that its customers will be without intraLATA long distance service due to its failure to meet the conversion deadline set by the FCC. Thus, only carriers like CWI are faced with the competitive disadvantage caused by the shortened time frame for converting from three to four digit CICs.

In addition to the need to reprogram all of its automatic dialers, CWI's customers who have installed their own CPE will need to be notified in order to determine whether they need to reprogram their equipment. Because this is not CWI maintained equipment, CWI is unclear on exactly how these customers are to be notified. Typically, once a vendor installs customer-purchased equipment, they do not necessarily maintain a relationship with the customer. CWI

can only assume that the Commission intends to conduct a public campaign to notify consumers, or will require notification by the LECs. Even so, customers will be hard pressed to make all necessary arrangements by the end of the year so that they may avoid any disruptions to their telecommunications network.

Finally, CWI maintains that there still may not be adequate time for all carriers to make the necessary changes to their switches to allow for four digit CICs. While many vendors have developed the software necessary to interpret the new codes, some companies, such as CWI, have their own proprietary switches which may not be capable of accepting four digit codes. CWI is in the process of developing software, but fears that there will be little time left to test, troubleshoot and verify the use of four digit codes with other carriers. Testing both in the lab and with other carriers is crucial with today's sophisticated network to ensure that network glitches are ironed out before going live. For example, approximately six months ago, a major U.S. carrier, and a CWI international vendor, reconfigured its international switches to accept only calls accompanied by the four digit code. However, the carrier had failed to inform CWI of the change, and therefore CWI was only passing three digit codes to this vendor. The result was a total blockage of international calls for CWI customers until CWI could reroute the traffic to another carrier. This type of scenario demonstrates the importance of coordination within the industry in making the transition to four digit CICs.⁴

For these reasons, CWI requests that the Commission extend the transition period for a period of two years to January 1, 2000, as requested by CompTel. A two-year extension of the

⁴ For example, the Commission should take note of the manner in which the implementation of Caller I.D., SS7, and number portability was coordinated within the industry, *i.e.*, through joint planning, testing, troubleshooting, etc.

transition is necessary to prevent disruption of service to consumers and to ensure that the transition does not place non-incumbent carriers like CWI at a competitive disadvantage.

CONCLUSION

For the foregoing reasons, the Commission should extend the transition period for four digit CICs to January 1, 2001, as requested by the CompTel Petition for Reconsideration.

Respectfully submitted,
CABLE & WIRELESS, INC.

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